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Before the

Before the

Washington, D.C.

In the Matter of)	
)	
The Development of Operational,)	
Technical and spectrum Requirements)	
For Meeting Federal, State and Local)	WT Docket No. 96-86
Public Safety Agency Communication)	
Requirements Through the Year 2010)	
)	
Establishment of Rules and Requirements)	
For Priority Access Service)	

REGARDING SPECTRUM TRANSFER

December 19, 1997

We believe the record shows that in the practical market place, the industry is quickly moving from a duapoly to a monopoly - a national disgrace. the reasons for this are to numerous to mention here.

For the Commission to follow the same old routine, we believe, will only promagate a situation which is not in the nation's best interest. The suggested approach to changing the industry to a better direction, would be to transfer this spectrum to the cellular industry as a trustee to be utilized only by Federal, State and local public safety - public service organizations.

We urge the Commission to give this serious, favorable consideration.

Frederick G. Griffin, P.E.

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About FREDERICK G. GRIFFIN, P.C.

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Entering Our Second Quarter Century Of Service

FREDERICK G. GRIFFIN, P.C. was established to provide telecommunications consulting and engineering services to local governments. Founded by Frederick G. Griffin, P.E., In 1972 as a personal consulting service, the firm expanded to a full business venture in 1974 as FREDERICK G. GRIFFIN, INC. The firm acquired its current name in 1979 when it became a registered professional corporation in the Commonwealth of Virginia. It has since become a registered corporation in other states and is one of a select few communications consulting firms in the country that are subject to review at the state level for ethics and work product performance. Clients include local, state and federal governments, utilities, common carrier and volunteer organizations. The firm is headquartered in Lynchburg, Virginia, and has a field office in Washington, D.C.

CEO and president Frederick G. Griffin, P.E., is a registered professional engineer in the Commonwealth of Virginia. Telecommunications expertise he acquired earlier as an employee of a large communications equipment manufacturer is complemented by a well-trained and client-oriented staff.

The firm also has an associate staff of professional engineers to draw on as the needs require, to complement the firm's communications expertise.

Personnel maintain their state-of-the-art pursuits through seminars in their respective disciplines and active membership in technical organizations that include the Association of Federal Communications Consulting Engineers (AFCCE), the Institute of Electric & Electronic Engineers, Inc. (IEEE), the Association of Public Safety Communication Officers (APCO), and the National Society of Professional Engineers (NSPE).

xpertise
The firm's areas of expertise include:

- ◆ Land Mobile Radio Systems
- ◆ 800 MHz Trunked Radio Systems
- ◆ Microwave Systems
- ◆ Telephone Systems
- ◆ SCADA Systems
- ◆ Telemetric Systems
- ◆ Cellular/PCS/PCN
- ◆ Local Area Networks
- ◆ Telephone Networks
- ◆ FCC and FAA Liaison

ervices

Totally independent of any manufacturer, distributor, software supplier, airtime service provider or vendor, the firm offers unbiased service to its clients. Recommendations are dictated by one criterion: what best fits a client's needs.

Professional services include:

- ♦ Negotiations
- ◆ Feasibility Studies/Economic Analysis
- ◆ Systems Engineering
- ◆ Equipment Specifications
- ◆ Physical Facilities Planning
- ◆ Field Engineering/Measurements
- ◆ Appraisals and Technical Evaluations
- ◆ Acceptance Testing
- ◆ Project Management/Monitoring

The firm also provides expert testimony for insurance claims investigations, public utility commissions, local zoning boards, and FCC filings.

Headquarters houses the firm's technical library and computer facilities. Extensive in-house computing capabilities to conduct a propagation analysis and a wide range of design engineering services thus reduces the time and cost required to perform such services. Computer services include: terrain and path profiling, intermodulation studies, frequency coordination, remote computer access, traffic loading and analysis, propagation, interference, point-to-point and CATV system analysis, and database development.

A combination of pre-packaged and customerdeveloped software is used, and the firm develops its own software as needs arise.

Project site management and field measurements are provided. Precision field and laboratory testing is provided through an associated measurements laboratory.

A carefully selected project team researches and accumulates data, develops a process or solution, and then prepares the implementation for each project. The focus is future oriented - anticipating changing needs and resolving potential problems. The sequence of events ensures the integrity of both cost and value.

Experience and Know-How
Decades of combined staff experience in
diverse and complementary communications
disciplines assures client satisfaction.

The firm is active in the 800 MHz trunked radio systems evolution as well as industry regulatory activities. Mr. Griffin chaired the trunked radio panel at the 1993 Mid-Atlantic APCO convention. The firm was a principal contributor on the subject of incompatibility of 800 MHz trunked equipment through articles written by Mr. Griffin and staff. It was represented on the National Public Safety Planning and Advisory Committee (NPSPAC), which was charged by the FCC to develop a national plan for the allocation of the new 800 MHz frequencies. The firm wrote the technical portion of the Region 42, 800 MHz plan. Mr. Griffin is at the forefront of developing digital trunking standards and spectrum planning. He was a member of APCO's Project 25 and Public Safety Wireless Advisory Committee (PSWAC). He is a member of Mobile Radio Technology's editorial advisory board, and is past president of the AFCCE. The AFCCE is comprised of consulting engineers at the highest level of their respective fields who practice before the Federal Communications Commission (FCC) on engineering and regulatory matters. He is an associate member of the Federal Communications Bar Association.

Over the years, staff articles have been published in various trade journals. Mr. Griffin has spoken and written on the topic of negotiations and minimizing protest and litigation.

The firm's Washington area office is located at:

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